IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,

Plaintiff,

VS.

CRIMINAL NO. 19-566 (FAB)

BRYAN G. DIAZ-DE JESUS,

Defendants.

JOINT INFORMATIVE MOTION AND REQUEST FOR AN EXTENSION OF TIME

TO THE HONORABLE COURT:

COMES NOW the United States of America, through its attorneys, and defendant Bryan G. Diaz De Jesus through his counsel Wilfredo Diaz-Narvaez, and very respectfully state and pray as follows:

- 1. On March 3, 2021, this Honorable Court granted the parties until today to inform of the status of the negotiations regarding the drug quantity. *See* ECF No. 46.
- 2. No stipulation regarding the drug quantity has been reached in this case. However, as a last attempt, a conference call has been scheduled for next week to discuss the legal arguments of both parties. The aforementioned, in an attempt to simplify the arguments and controversies that could arise at sentencing.
- 3. Due to the aforementioned, an extension of time until April 9, 2021, is hereby requested.
- 4. The instant request is due o good faith and is not intended to delay the proceedings in the case.

WHEREFORE, the parties respectfully request that the Court take note of this informative motion and grants the extension of time hereby requested.

RESPECTFULLY SUBMITTED,

In San Juan, Puerto Rico, this 22nd day of March, 2021.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all attorneys of record.

<u>s/ María L. Montañez-Concepción</u> María L. Montañez-Concepción Assistant United States Attorney